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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Master File No. 3:07-md-1827 SI
MDL No. 1827

15 This Document Relates To:

16 Case No. 09-cv-5609 SI

17 NOKIA CORPORATION and
18 NOKIA, INC.,

19 Plaintiffs,

20 v.

21 AU OPTRONICS CORPORATION, et al.

22 Defendants.

**STIPULATION AND [PROPOSED]
ORDER MODIFYING DEADLINE
FOR FILING OF MOTION TO
COMPEL**

1 Plaintiffs Nokia Corporation and Nokia, Inc. (collectively, “Nokia”) and Defendants
2 Hitachi, Ltd. and Hitachi Displays, Ltd. (collectively, the “Hitachi Defendants”) hereby
3 stipulate as follows:

4 **STIPULATION**

5 WHEREAS discovery closed in this case on December 8, 2011, as set forth in the
6 Stipulation and Order Modifying Pretrial Schedule for “Track One” Direct Action Plaintiff
7 and State Attorney General Actions (Dkt. No. 3110, the “Scheduling Order”);

8 WHEREAS Nokia served its First Set of Requests for Admission (“Requests”) to
9 the Hitachi Defendants on November 8, 2011;

10 WHEREAS the Court has entered an Order extending the close of fact discovery set
11 forth in the Scheduling Order for the limited purpose of allowing the Hitachi Defendants
12 respond to Nokia’s First Set of Requests for Admission to December 23, 2011 (Dkt. No.
13 4357);

14 WHEREAS the Hitachi Defendants served responses to Nokia’s First Set of
15 Requests for Admission on December 23, 2011.

16 WHEREAS, the Court has entered an Order extending the time for the filing of
17 motions to compel as to Nokia’s and defendants’ remaining discovery responses to January
18 13, 2012 (Dkt. 4387);

19 WHEREAS, Nokia and the Hitachi defendants are continuing to meet and confer
20 regarding Hitachi Defendants’ response to Nokia’s First Set of Requests for Admission.

21 WHEREAS, Nokia and the Hitachi defendants hope to resolve these issues
22 informally, without the need to file a motion to compel and seek the Court’s involvement;

23 WHEREAS in an effort to facilitate the informal resolution of these issues, Nokia
24 and the Hitachi Defendants wish to extend the deadline to file any motion to compel with
25 respect to the Hitachi Defendants’ response to Nokia’s First Set of Requests for Admission
26 through February 1, 2012.

27 NOW, THEREFORE, Nokia and the Hitachi defendants, through their undersigned
28 respective counsel, stipulate and agree as follows:

1 The deadline for Nokia to file any motion to compel with respect to the Hitachi
2 Defendants' responses to Nokia's First Set of Requests for Admission is extended through
3 and including February 1, 2012.

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5 DATED: January 13, 2012.

/s/ Kent M. Roger

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11 *Counsel for Defendants Hitachi, Ltd., Hitachi Displays,*
12 *Ltd. and Hitachi Electronic Devices (USA), Inc.*

/s/ Valarie C. Williams

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17 *Counsel for Plaintiffs Nokia Corporation and Nokia Inc.*

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20 **IT IS SO ORDERED.**

21
22 Dated Entered: 1/18/12



The Honorable Susan Illston
District Court Judge

24 **ATTESTATION:** Pursuant to N.D. Cal. General Order 45, Part X-B, the filer attests that
25 concurrence in the filing of this document has been obtained from each signatory hereto.
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